

EXHIBIT A-1

EXHIBIT 21

1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF NEW YORK

3 Civil Action No. 1:20-cv-07103-JGK

4 EDMOND GRANT P/K/A "EDDY
5 GRANT", GREENHEART MUSIC
6 LIMITED, a United Kingdom Limited
7 Company, and GREENHEART MUSIC
8 LIMITED, an Antigua and Barbuda Limited
9 Company,

10 Plaintiffs,

11 - against -

12 DONALD J. TRUMP and DONALD J.
13 TRUMP FOR PRESIDENT, INC.,

14 Defendants.

15 CONFIDENTIAL/ATTORNEYS' EYES ONLY

16 Deposition of

17 Donald J. Trump

18 Thursday, June 9, 2022

19 10:14 a.m., Eastern

20
21
22
23
24 Reported By: Barbara J. Carey, RPR
25 Job No: 211784

<p style="text-align: right;">Page 6</p> <p>1 D. Trump</p> <p>2 will the court reporter please swear in the witness?</p> <p>3 THE REPORTER: Mr. President, raise your</p> <p>4 right hand and I will swear you in.</p> <p>5 (The oath was administered by the court</p> <p>6 reporter.)</p> <p>7 WITNESS RESPONSE: Yes.</p> <p>8 THE REPORTER: Thank you.</p> <p>9 You may begin.</p> <p>10 DONALD J. TRUMP,</p> <p>11 After having been first duly sworn, was called as a</p> <p>12 witness and testified as follows:</p> <p>13 EXAMINATION</p> <p>14 BY MR. CAPLAN:</p> <p>15 Q. Good morning, Mr. Trump. My name is Brian</p> <p>16 Caplan, and I represent Eddy Grant and two Greenheart</p> <p>17 Music Limited entities in a copyright infringement action</p> <p>18 brought against you and Donald J. Trump for President,</p> <p>19 Inc. in the Southern District of New York.</p> <p>20 I'm going to ask you a series of questions</p> <p>21 here this morning. I'd like you to do the best you can to</p> <p>22 answer them.</p> <p>23 If you don't understand a question, can you</p> <p>24 let me know, and I'll do the best I can to rephrase it?</p> <p>25 If you answer a question, I will take that to mean that</p>	<p style="text-align: right;">Page 7</p> <p>1 D. Trump</p> <p>2 you understood the question posed to you.</p> <p>3 Is that acceptable to you, sir?</p> <p>4 A. Yes.</p> <p>5 Q. Thank you.</p> <p>6 Have you been deposed before?</p> <p>7 A. Yes.</p> <p>8 Q. Approximately how many times, roughly?</p> <p>9 A. Don't know. Many times.</p> <p>10 Q. More than 20?</p> <p>11 A. Yes.</p> <p>12 Q. Okay. Do you understand the general</p> <p>13 deposition protocols?</p> <p>14 A. Yes.</p> <p>15 Q. Okay.</p> <p>16 MR. CARUSO: Mr. Caplan, one moment. We</p> <p>17 should make a statement about the confidentiality.</p> <p>18 MR. CAPLAN: Sure.</p> <p>19 MR. CARUSO: Mr. Kasner is going to make</p> <p>20 that statement.</p> <p>21 MR. KASNER: This is Jason Kasner. Just</p> <p>22 for the record, the attorneys have agreed that the</p> <p>23 deposition will be considered Confidential/Attorneys' Eyes</p> <p>24 Only under the Protective Order in this case with the</p> <p>25 exception of the participants that are actually on the</p>
<p style="text-align: right;">Page 8</p> <p>1 D. Trump</p> <p>2 deposition.</p> <p>3 Thank you.</p> <p>4 MR. CAPLAN: Agreed.</p> <p>5 Q. Have you ever been a plaintiff in a</p> <p>6 copyright --</p> <p>7 THE REPORTER: Excuse me, Counsel. One</p> <p>8 moment.</p> <p>9 I just wanted to clarify, the gentleman</p> <p>10 sitting right next to President Trump, is that Mr. Caruso?</p> <p>11 MR. CARUSO: Yes, it is.</p> <p>12 THE REPORTER: All right. I just wanted</p> <p>13 to clarify. Thank you.</p> <p>14 Q. Mr. Trump, have either you or any of your</p> <p>15 entities been plaintiffs in copyright infringement</p> <p>16 actions?</p> <p>17 A. I don't know. Not a big thing, but I don't</p> <p>18 know.</p> <p>19 Q. Okay. Have you personally ever been a</p> <p>20 defendant in a copyright infringement action?</p> <p>21 A. Not that I know of. I may have been, but a</p> <p>22 lot of things happen. I don't know.</p> <p>23 Q. Where are you located today, sir? Where are</p> <p>24 you presently sitting?</p> <p>25 A. Bedminster, New Jersey.</p>	<p style="text-align: right;">Page 9</p> <p>1 D. Trump</p> <p>2 Q. And other than the three attorneys to your</p> <p>3 right, are there anybody else in the room?</p> <p>4 A. No.</p> <p>5 Q. Okay. Do you have any written materials in</p> <p>6 front of you, sir?</p> <p>7 A. No.</p> <p>8 Q. Do you have any screens open other than the</p> <p>9 link to this deposition?</p> <p>10 A. No.</p> <p>11 Q. Did you take any steps to prepare for today's</p> <p>12 deposition?</p> <p>13 A. Other than speaking to my lawyer very briefly,</p> <p>14 no.</p> <p>15 Q. And when did you speak to your lawyer?</p> <p>16 A. Yesterday.</p> <p>17 Q. And for how long, approximately?</p> <p>18 A. 30 minutes.</p> <p>19 Q. Okay.</p> <p>20 A. 20 minutes.</p> <p>21 Q. Did you review any documents during that</p> <p>22 session?</p> <p>23 A. No.</p> <p>24 MR. CARUSO: Okay. I'm going to object</p> <p>25 to that. The question's been answered, but I want my</p>

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1 D. Trump
 2 objection on the record before it.
 3 THE WITNESS: Okay.
 4 MR. CARUSO: Go ahead.
 5 Q. Did you ever see a copy of the Complaint in
 6 this action?
 7 A. No.
 8 Q. Ever see a copy of the Answer in this action?
 9 A. I have not.
 10 Q. You ever seen any initial disclosures made by
 11 your attorneys in this action?
 12 A. No.
 13 Q. Okay. Do you understand what the claims are
 14 in this case?
 15 A. Very generally. Not really.
 16 Q. Okay. What do you generally understand them
 17 to be?
 18 A. I guess somebody suing on the basis that part
 19 of a song was used that was barely -- you could barely
 20 hear it. I don't know exactly, but -- I don't know. I
 21 never heard of the gentleman bringing the lawsuit. Never
 22 heard of him.
 23 Q. Okay. Are you familiar with Donald J. Trump
 24 for President, Inc.?
 25 A. Yes.

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1 D. Trump
 2 Q. I'm asking you about the purpose, not the
 3 year.
 4 A. You'd have to ask the lawyers.
 5 Q. Okay. So you don't know the general purpose
 6 of Donald J. Trump for President, Inc.?
 7 A. Well, it was to help get me elected, yes.
 8 Q. And you said, to the best of your
 9 understanding, it's still in existence today, sir?
 10 A. I believe so.
 11 Q. And in 2000 -- in August of 2020, was it the
 12 business of that entity to try to get you re-elected?
 13 A. I don't know. I'd have to ask the lawyers. I
 14 don't even know that it -- I don't even know for certain
 15 that it still exists.
 16 Q. Are you an officer or a director of that
 17 entity?
 18 A. I don't know.
 19 Q. Okay. Are you an employee of that entity?
 20 A. I don't know. I don't think so.
 21 Q. Do you know who the officers are of that
 22 entity?
 23 A. No. I have many, many, many entities. I
 24 don't know the specific officers.
 25 Q. Who would know who the officers and directors

Page 11

1 D. Trump
 2 Q. When was that entity formed approximately?
 3 A. I don't know.
 4 Q. Was it before your initial election in 2016?
 5 A. I believe so.
 6 Q. Okay. For what purpose was it formed?
 7 A. For that purpose.
 8 Q. To help get you elected?
 9 A. Yes.
 10 Q. Okay. Is it an active company today?
 11 A. I believe so, yes.
 12 Q. Okay.
 13 A. I don't think it's a company; it's a political
 14 entity.
 15 Q. Does that political entity still exist?
 16 A. I believe so, yes.
 17 Q. And what does it presently do?
 18 A. Generally speaking, I would have to ask the
 19 lawyers. It's a legal entity, so I'd have to ask the
 20 lawyers the purpose of that particular entity.
 21 Q. When was it -- when it was formed, it was
 22 formed for the purpose of helping you get elected in 2016;
 23 correct?
 24 A. I -- I would have to get you the exact date.
 25 I don't know the date.

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1 D. Trump
 2 of Donald J. Trump for President, Inc. are?
 3 A. My lawyers could get you that information.
 4 Q. Do you make -- have you made any decisions on
 5 behalf of that entity in the past?
 6 A. I would have to go back and review that. I
 7 don't know.
 8 Q. Who was running the day-to-day operations of
 9 that entity in 2020, if you know?
 10 A. In 2020?
 11 Q. Yes.
 12 A. It may have been -- it may have been
 13 [REDACTED]
 14 Q. And did she have -- did she have a title in
 15 2020?
 16 A. I can't give you that information, and I'd
 17 have to check to see if that's true.
 18 Q. Did [REDACTED] consult with you before making
 19 decisions on behalf of the entity in 2020?
 20 MR. CARUSO: I object to the form of the
 21 question. It's far too general, but you can answer it
 22 taking into account the straying generality.
 23 A. [REDACTED]
 24 Q. Was there an in-house attorney for that entity
 25 in 2020?

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1 D. Trump

2 A. I don't know.

3 Q. In 2020, did people prepare campaign materials

4 for the company?

5 A. Probably, yes. Yeah.

6 Q. And was that done in-house, or outside, or

7 both?

8 A. Both.

9 Q. Do you know how many employees the entity had

10 in 2020?

11 A. No.

12 Q. Was it more or less than 50, if you know?

13 A. I don't know.

14 Q. Did the company have its own Twitter account

15 in 2020?

16 A. I don't know.

17 Q. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

22 MR. CARUSO: Objection. Can you fix the

23 time, Counsel?

24 Q. In, we'll say, 2020.

25 A. [REDACTED]

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1 D. Trump

2 did you have somebody else do that on your behalf?

3 A. I would say that I don't know exactly. I

4 can't really answer that question.

5 Q. Okay. Is that your -- is that your personal

6 account on Twitter?

7 A. Yes.

8 Q. In the last 12 years, did you have any other

9 account at Twitter?

10 A. Not that I know of.

11 Q. Who taught you how to use Twitter?

12 A. I learned myself. Good student.

13 Q. Was the account suspended at a point in time?

14 A. Yes.

15 Q. And when was that, approximately?

16 A. It would be a year and a half ago or so.

17 Q. And what was the -- generally, what was the

18 basis for the suspension?

19 MR. CARUSO: I'm going to object for

20 lack of relevance. The witness can answer briefly.

21 At some point, we'll draw a line under this,

22 but go ahead, Mr. President.

23 A. [REDACTED]

[REDACTED]

[REDACTED]

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1 D. Trump

2 Q. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

9 Q. We'll get to that in more detail a little bit

10 later.

11 When's the last time you spoke to [REDACTED]

[REDACTED]

[REDACTED]

15 Q. Are you familiar with a gentleman by the name

16 of Will Ambruzs, A-M-B-R-U-Z-S?

17 A. I don't believe so, no.

18 Q. Was -- and now I'm going to have to spell all

19 this out -- the -- the sign @realDonaldTrump your handle

20 on Twitter?

21 A. Yes.

22 Q. And when -- what year did that become your

23 handle on Twitter?

24 A. Well, maybe 12 years ago.

25 Q. Did you set that up yourself personally, or

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1 D. Trump

2 Q. Over the last 12 years, what has been your

3 general purpose for using Twitter?

4 A. Communication, generally.

5 Q. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

21 Q. Let's look at a moment --

22 MR. CAPLAN: Let's mark as Exhibit 1 a

23 document bearing Bates Stamps Defender -- Defendant --

24 Defendants' 47 to 48.

25 MR. Van BENTHUSEN: Sure. I'll be

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1 D. Trump
 2 posting that to the chat so it can be downloaded. I'll
 3 also share my screen.
 4 Q. [REDACTED]
 5 [REDACTED]
 6 Can you identify for me who is Alex Cannon,
 7 please?
 8 MR. CARUSO: By the way, we can't see --
 9 we can't see the exhibit.
 10 MR. Van BENTHUSEN: Just give me one
 11 second, sorry.
 12 MR. CARUSO: Okay. But we do need to
 13 see it before the witness can answer.
 14 MR. Van BENTHUSEN: You can see it now.
 15 MR. CARUSO: Okay. Thank you. We see
 16 it now.

Page 20

1 D. Trump
 2 [REDACTED]
 3 [REDACTED]
 4 Do you see that?
 5 A. I do.
 6 Q. To the best of your understanding, is that
 7 statement by [REDACTED] correct?
 8 A. I think so. I don't know for sure, but I
 9 think so.
 10 Q. Okay. Do you know approximately how many
 11 followers you had on Twitter in 2020?
 12 A. I don't know. Close to 100 million.
 13 Q. And how many followers did you have on Twitter
 14 approximately when your account was suspended?
 15 MR. CARUSO: Objection to relevance, but
 16 you can answer.
 17 A. A similar amount.
 18 Q. Okay.
 19 A. Maybe a little bit more.
 20 Q. [REDACTED]
 21 [REDACTED]
 22 [REDACTED]
 23 [REDACTED]
 24 [REDACTED]
 25 [REDACTED]

Page 19

1 D. Trump
 2 [REDACTED]
 3 [REDACTED]
 4 [REDACTED]
 5 [REDACTED]
 6 Q. And who is [REDACTED]
 7 A. I don't know.
 8 Q. You see the query that [REDACTED] makes to
 9 [REDACTED]
 10 [REDACTED]
 11 MR. CARUSO: Just a moment while we read
 12 it. [REDACTED] Can you see that?
 13 A. I can see it -- barely see it. I mean, I can
 14 barely. This machine is very far away. What's this, a
 15 vision test?
 16 Q. I'm not giving you a vision test. I think
 17 your own lawyers might be because they can move it closer
 18 to you.
 19 MR. CARUSO: Well, it's been -- it's
 20 been enlarged now, so if you could scroll down a bit -- or
 21 up as the case might be. If you could put the relevant --
 22 yeah, in the center. That's it. Thank you.
 23 Q. There's an email from [REDACTED]
 24 [REDACTED]
 25 [REDACTED]

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1 D. Trump
 2 [REDACTED]
 3 [REDACTED]
 4 [REDACTED]
 5 [REDACTED]
 6 [REDACTED]
 7 [REDACTED]
 8 [REDACTED]
 9 [REDACTED]
 10 [REDACTED]
 11 [REDACTED]
 12 [REDACTED]
 13 [REDACTED]
 14 [REDACTED]
 15 [REDACTED]
 16 [REDACTED]
 17 [REDACTED]
 18 [REDACTED]
 19 [REDACTED]
 20 [REDACTED]
 21 [REDACTED]
 22 [REDACTED]
 23 [REDACTED]
 24 [REDACTED]
 25 [REDACTED]

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D. Trump

MR. CARUSO: One moment, please. I just
hat the court reporter captured the last
answer, which was "Twitter."

A.

MR. CARUSO: Precisely. I just wanted
the two people were talking over each

So Madam Court Reporter, can you confirm that,

THE REPORTER: One moment.

MR. CARUSO: Yes, please.

THE REPORTER: Let me just check. I

(The record was read by the reporter as follows: [REDACTED])

MR. CARUSO: Right. That answer ended
titter." [REDACTED]

Page 24

D. Trump

MR. CARUSO: Okay. The witness has fine.

0.

A. I don't know.

0. Hundreds?

A. Oh, yeah. Sure.

0.

Page 23

D. Trump

So if the court reporter can just be sure that reflects that, then we'd be prepared for more

THE REPORTER: Okay. Maybe -- yeah, I tried now, and I will verify that when I transcript.

MR. CARUSO: Thank you.

THE REPORTER: Yeah.

THE WITNESS: I did say that. I did say

MR. CARUSO: I know. That's why I'm

BY MR. CAPLAN:

0.

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D. Trump

A.

MR. CARUSO: Objection. Objection. The
" is --

MR. CAPLAN: Thank you. I'll withdraw

Q.

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1 D. Trump
2 MR. CARUSO: Just -- objection. Fix the
3 time, please.
4 Q. During your presidency?
5 MR. CARUSO: Okay. Now, can we have the
6 whole question read, please, Madam Reporter?
7 THE REPORTER: Okay. One moment.
8 (The record was read by the reporter as
9 follows: "Q: [REDACTED]

[REDACTED]

21 MR. CAPLAN: Can we mark as Exhibit 2
22 and play for Mr. Trump the song "Electric Avenue"?

23 MR. CARUSO: Okay. Sorry, this is the
24 song, not the animation at issue in the case?

25 MR. CAPLAN: Correct.

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1 D. Trump
2 THE REPORTER: Okay. One moment.
3 (The record was read by the reporter as
4 follows: "Q: [REDACTED]

[illegible]

10 MR. CARUSO: The question concerns your
11 custom and practice.

12 You can answer.

13 A. [REDACTED]

15 Q. How often per day would you normally monitor
16 your Twitter account in, let's say, 2020?

17 A. Well, I'd read my account, or I'd see my
18 account and see -- if I put up a Tweet, I'd see that it
19 was up, so I'd check it automatically. You'd Tweet it,
20 and then you'd make sure it's up. Sometimes you'll find a
21 mistake after it's up and you'll delete it and you'll put
22 the same Tweet up without the mistake.

23 Q. [REDACTED]
[REDACTED]
[REDACTED]

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1 D. Trump
2 (Whereupon, Exhibit 2, Song - Electric
3 Avenue Bates: GRANT0185, was marked.)
4 MR. Van BENTHUYSEN: I'm playing it now.
5 MR. CAPLAN: Thank you.
6 (Whereupon, Exhibit 2, "Electric
7 Avenue", was played.)
8 MR. CAPLAN: That's good enough.
9 MR. Van BENTHUYSEN: And just for the
10 purposes of the court reporter, what was just played was
11 marked in this -- was produced in this action bearing
12 Bates Stamp GRANT0185.

13 Q. Mr. Trump, we just listened to the song
14 "Electric Avenue."
15 And sir, had you ever heard that song before
16 today?

17 A. No, other than a very small piece was played
18 for me by my attorney to ask me the same question. I had
19 never heard of the song.

20 Q. Okay. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

24 MR. CARUSO: Can we have that read back,
25 please? There's a lot in there.

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1 D. Trump

2 A. [REDACTED]

3 Q. Did you monitor feedback or responses to

4 Tweets made by yourself?

5 A. Sometimes. Not -- I didn't have very much

6 time to do that, but sometimes.

7 Q. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

11 Q. Would it be fair to say that you looked at
12 your Twitter feed at least once a day during your
13 presidency?

14 A. Yeah, it would be -- again, I didn't have very
15 much time. I was trying to keep Russia from going into
16 Ukraine successfully and other things. So I didn't have a
17 lot of time to be doing that.

18 Q. But you did it -- you would have reviewed it
19 once a day, on average?

20 A. I'd review it. I can't say once a day. I'd
21 review it. Yeah, a little bit. I didn't have much time.

22 Q. Would it be fair to say you didn't go weeks
23 without looking at your Twitter feed?

24 A. Probably not.

25 Q. Okay.

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1 D. Trump

2 MR. CAPLAN: Let's mark as Exhibit 3 a

3 Declaration from Mr. Saunders dated November 11th, 2020.

4 THE REPORTER: Court reporter here.

5 Just to clarify, there are two downloads in

6 the chat box, two new ones.

7 MR. CAPLAN: There is Exhibit 3, and

8 then there is -- excuse me, there is Exhibit 3, and then

9 there is an exhibit to that document. So if we could

10 start off by looking at paragraph 4 of Exhibit 3.

11 MR. SAUNDERS: Can you please put this

12 full screen?

13 (Whereupon, Exhibit 3, Declaration of

14 Darren W. Saunders in Support of Defendants'

15 Motion to Dismiss the Complaint (2 pages), was

16 marked.)

17 MR. CARUSO: Paragraph 4, attached

18 hereto as Exhibit 3, is a true and correct copy of a

19 website screenshot of a digitally archived version of

20 defendant Donald J. Trump's Tweet as referenced in

21 paragraph 35 of the complaint. Okay.

22 Q. And it goes on to say that the screenshot

23 shows the Tweet as of April 13th, 2020.

24 Do you see that, Mr. Trump?

25 A. What Tweet are you talking about?

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1 D. Trump

2 2020?

3 A. This Tweet, here, you're you talking about?

4 Q. Yes.

5 A. No, I don't recall it.

6 Q. [REDACTED]

7 [REDACTED]

8 MR. CARUSO: Just a moment. Just a

9 moment. That assumes facts not in evidence, that

10 [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 A. No, I don't -- I just don't recall this --

14 seeing this, at all.

15 Q. Was --

16 MR. CAPLAN: Let's show you, now, the

17 video that was attached to this Tweet, and we're going to

18 mark that as Exhibit 4.

19 (Whereupon, Exhibit 4, 10-20-2020 - Video,

20 was marked.)

21 MR. Van BENTHUSEN: I just attached it

22 to the chat. I attached -- it's been produced in this

23 action as GRANT0190. I'll share my screen now.

24 MR. CAPLAN: Thank you, Brett.

25 You've got to turn the volume on.

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1 D. Trump

2 Q. Okay. We're now going to look at Exhibit 3 to

3 this document.

4 MR. CARUSO: He's going to show us a

5 screenshot of this Tweet.

6 Q. Okay. So this is a screenshot of the subject

7 Tweet at issue in this litigation.

8 Do you see that, sir?

9 MR. CARUSO: Well, we see something on

10 the screen. You're representing what it is. We'll accept

11 your representation for the moment.

12 Go ahead.

13 MR. CAPLAN: Actually, Mr. Saunders made

14 the representation but --

15 MR. CARUSO: Okay. But you're making it

16 today.

17 MR. CAPLAN: Correct.

18 MR. CARUSO: So it's your

19 representation.

20 MR. CAPLAN: Correct.

21 MR. CARUSO: So proceed.

22 Q. Okay. Have you ever seen this screenshot

23 before?

24 A. I don't remember it, no.

25 Q. Okay. Do you recall a Tweet from August 12th,

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1 D. Trump

2 (Whereupon, Exhibit 4 was played.)

3 Q. Have you ever seen this video before?

4 MR. CARUSO: One moment, please.

5 Are you excluding discussions with counsel

6 from that question?

7 MR. CAPLAN: Excluding discussions

8 yesterday with counsel from that -- from that question.

9 MR. CARUSO: I didn't just say

10 yesterday.

11 Are you excluding discussions with counsel

12 from that question?

13 MR. CAPLAN: The answer is I'm not. So

14 the question is did he --

15 Q. When -- have you ever seen that video before?

16 MR. CARUSO: You can answer "yes" or

17 "no."

18 A. I don't believe so, no.

19 Q. Okay. Do you know who authored the Tweet that

20 went out on August 12th, 2020?

21 A. Was it a Tweet or a Retweet? Wasn't that a

22 copy of somebody else's Tweet? I thought it was a copy of

23 somebody else's Tweet.

24 Q. Can you tell us --

25 A. Somebody else -- somebody else did that. We

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1 D. Trump
2 didn't do that, as I understand it. Somebody else was the
3 author of that piece. We were not. This was on the
4 internet, and thousands and hundreds of thousands of
5 people could have picked it up -- I doubt they did -- but
6 this -- this was a -- I thought it was a piece that was
7 authored by somebody else that was on the internet for
8 everybody to see. Had nothing to do with us.

9 Q.

[REDACTED]

25 MR. CARUSO: Just a moment. Just a

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1 D. Trumpo

2 [REDACTED]

4 MR. CARUSO: Okay.

5 A. Well, why aren't you suing the one that did
6 it?

7 Q. I'm asking you for your understanding, that's
8 all.

9 A. No, I'm just saying, why aren't you suing the
10 one that did it? We didn't do it.

11 There's somebody else, artistically -- if you
12 call it artistic -- they put it up, and we used it along
13 with maybe other people used it. Are you suing them, too?
14 I'm sure this was maybe used by other people or Retweeted
15 by other people.

16 You're not -- as I understand it, you're not
17 suing the person that was the creator of the piece.

18 Q. In August --

19 A. They're the ones, I think, should be sued,
20 because everybody on the internet could use it once it was
21 put up. I don't know how many people used it, but I
22 assume you're suing all the other people that used it,
23 also.

24 Q. Did all the other people send it to
25 100 million Twitter followers?

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1 D. Trump

2 moment. You can answer that "yes" or "no" or "I don't
3 know," but don't disclose the substance of conversations
4 with lawyers.

5 A.

MR. CARUSO: Good.

7 Q. What was the purpose of this Tweet or Retweet?

8 A. I don't know what it even represents. You can
9 hardly hear the music. The music was very low, and you
10 know, it was -- it was a political thing. I guess they
11 put it in -- you'd have to ask the author. We did not
12 author that, I don't believe. This was done by some other
13 person and put out on the internet for everybody to use
14 and to see. I don't think it had any meaning -- much of a
15 meaning, but you could hardly hear the music because there
16 were words over the top of the music that were added by
17 whoever -- whoever did the authoring.

18 Q. Do you have any basic understanding of
19 copyright law, sir?

20 A. Yes, I do.

21 Q.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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1 D. Trump

2 A. Well, they all had access to it before I got
3 involved. We got it off the internet. As I understand
4 it, we got it off the internet.

5 Q. And how do you --

6 A. I don't understand what case your client has.

7 Q. How is it you're understanding that you --
8 that you got it off the internet?

9. A.

[illegible]

19 Q. Do you know when it was obtained off the
20 internet?

21 A. Whenever the piece went up. I mean, these
22 things are very quick. You know, you look at a piece, you
23 like it, you put it up. I mean, if it was -- if it
24 weren't Trump, you wouldn't be bringing a lawsuit. But
25 many people put that piece up, and many people put a lot

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1 D. Trump
2 THE WITNESS: It doesn't. So I don't
3 know what it means.
4 MR. CARUSO: He's got an hour left. Let
5 him get through his -- he's got to show his -- show the
6 flag here.
7 Is there a question pending?
8 MR. CAPLAN: Yes, can you read back the
9 question, Ms. Court Reporter?
10 THE REPORTER: Okay. One moment.
11 (The record was read by the reporter as
12 follows: "Q: [REDACTED]

18 MR. CARUSO: You can answer "yes," "no,"
19 "I don't know."

20 A. [REDACTED]

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1 D. Trump
2 Q. [REDACTED]

[illegible]

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D. Trump

Q.

16 Q. Okay. Do you know how many people -- how many
17 of your followers viewed the subject video?

18 A. I have no idea. Are you asking before I put
19 it up or after I put it up?

20	0.	After.
----	----	--------

21 A. Oh. What about before?

22 Q. I'm asking the questions here.

23 A. Just curious. Because they could have
24 reviewed it before I put it up because it was available to
25 them.

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D. Trump

Q.

13 Q. Were you aware of any claim made by Mr. Grant
14 in 2020 in connection with the Tweet that we've been
15 discussing?

16 A. Not that I've heard of. I don't believe so.

17 Q. Did you ever see a letter from Mr. Grant's
18 attorneys requesting that the Tweet be removed?

19 A. No. If I did, I would have removed the Tweet
20 immediately because it didn't mean anything.

21 Q. Okay. Did there come a --

22 A. I wish I did see it because then I wouldn't be
23 paying legal fees right now. I would have taken it down
24 immediately.

25 Q. Did there come a time that your organization